

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-cr-21-PP

vs.

SAMY M. HAMZEH,

Defendant.

UNOPPOSED MOTION TO AMEND THE SCHEDULING ORDER

Samy Hamzeh, by counsel, moves to modify the Court's scheduling order regarding submissions in response to the Seventh Circuit's ruling. I have spoken to AUSA Kevin Knight and he has no objection to this request.

The Court previously set a scheduling order that aligned with what the parties had proposed. While enough time was built in and the defense has a significant amount of the work done, undersigned counsel contracted COVID last month and had a rough go of it. Only in the last week, has my energy fully returned. As such, I have not been able to complete the work on the transcripts and meet the previously agreed upon deadlines. Thus, I would respectfully request two additional weeks be added to each sides' deadlines. Again, I have spoken to AUSA Kevin Knight and he does not oppose this request. The new briefing schedule would be as follows:

- By September 17, the defense will submit to the government a draft brief about the statements and evidence that the defense still intends to object to.
- By October 8, the government will respond, identifying the points of agreement and disagreement.
- By October 22, the defense will file an omnibus brief identifying all the points of agreement and disagreement and the briefing in support of *why* certain statements remain inadmissible.
- By November 5, the government will file its response brief.
- By November 12, the defense will file its reply brief.

Dated at Milwaukee, Wisconsin this 31st day of August, 2021.

Respectfully submitted,

/s/ Joseph A. Bugni
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